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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACQUES ANTON LANIER,
a.k.a. "John Dupree,"

Defendant.

**SUPERSEDING
CRIMINAL INDICTMENT**

Case No. 2:19-cr-000327-GMN-VCF

VIOLATIONS:

18 U.S.C. §2422(b) – Coercion and Enticement

18 U.S.C. §1512(b) – Tampering with a Witness,
Victim, or an Informant

18 U.S.C. § 1591(a) and (b)(2) – Sex Trafficking
of Children

18 U.S.C. § 2423(b) – Travel with Intent to
Engage in Illicit Sexual Conduct

18 U.S.C. § 1470 – Transfer of Obscene Material
to Minor

18 U.S.C. § 2251(a) – Sexual Exploitation of a
Child

1 **THE GRAND JURY CHARGES THAT:**

2 **COUNT ONE**
3 Coercion and Enticement
(18 U.S.C. § 2422(b))

4 Beginning on or about April 14, 2017, and continuing to on or about September 5, 2017,
5 in the State and Federal District of Nevada,

6 **JACQUES ANTON LANIER,**
7 **a.k.a. "John Dupree,"**

8 defendant herein, while using a facility and means of interstate and foreign commerce, did
9 knowingly, and attempted to, persuade, induce, entice, and coerce Victim #2, who had not
10 attained the age of 18 years, to engage in prostitution and any sexual activity for which any
11 person could be charged with a criminal offense, that is: *sex trafficking*, in violation of Nevada
12 Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children*, in violation of Title 18,
13 United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section
14 2422(b).

15 **COUNT TWO**
16 Tampering with a Witness
(18 U.S.C. § 1512(b))

17 Beginning on or about April 12, 2018, and continuing up to and including on or about
18 January 27, 2020, in the State and Federal District of Nevada,

19 **JACQUES ANTON LANIER,**
20 **a.k.a. "John Dupree,"**

21 defendant herein, did knowingly intimidate, threaten and corruptly persuade Victim #2 with
22 the intent to cause and induce Victim #2 to evade legal process summoning Victim #2 to
23 appear as a witness, and with the intent to hinder, delay, and prevent the communication to a
24 law enforcement officer and judge of the United States, of information relating to the

1 commission and possible commission of a Federal offense, and attempted to do so, all in
2 violation of Title 18, United States Code, Section 1512(b).

3 **COUNT THREE**
4 Coercion and Enticement
(18 U.S.C. § 2422(b))

5 Beginning on or about May 4, 2017, and continuing up to and including on or about
6 August 31, 2017, in the State and Federal District of Nevada,

7 **JACQUES ANTON LANIER,**
8 **a.k.a. "John Dupree,"**

9 defendant herein, while using a facility and means of interstate and foreign commerce, did
10 knowingly, and attempted to, persuade, induce, entice, and coerce Victim #3, who had not
11 attained the age of 18 years, to engage in prostitution and any sexual activity for which any
12 person could be charged with a criminal offense, that is: *lewdness with a child*, in violation of
13 Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada
14 Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes,
15 Section 201.300(2)(a)(1); *sexual exploitation of children*, in violation of Title 18, United States
16 Code, Section 2251(a); and *sex trafficking of children*, in violation of Title 18, United States Code,
17 Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

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COUNT FOUR

Coercion and Enticement
(18 U.S.C. § 2422(b))

Beginning on or about April 18, 2017, and continuing up to and including on or about December 6, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce Victim #4, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, that is: *lewdness with a child*, in violation of Nevada Revised Statutes, Section 201.230(1)(a); *sexual assault*, in violation of Nevada Revised Statutes, Section 200.366(1)(b); *statutory sexual seduction*, in violation of Nevada Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children*, in violation of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

COUNT FIVE

Coercion and Enticement
(18 U.S.C. § 2422(b))

Beginning on or about August 5, 2017, and continuing up to and including on or about October 16, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #5, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any

1 person could be charged with a criminal offense, that is: *lewdness with a child*, in violation of
 2 Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada
 3 Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes,
 4 Section 201.300(2)(a)(1); *sexual exploitation of children*, in violation of Title 18, United States
 5 Code, Section 2251(a); and *sex trafficking of children*, in violation of Title 18, United States Code,
 6 Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

7 **COUNT SIX**
 8 Sex Trafficking of Children
 (18 U.S.C. § 1591(a) and (b)(2))

9 Beginning on or about August 5, 2017, and continuing up to and including on or about
 10 October 16, 2017, in the State and Federal District of Nevada,

11 **JACQUES ANTON LANIER,**
 12 **a.k.a. "John Dupree,"**

13 defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit,
 14 entice, harbor, transport, provide, obtain, maintain, patronize, and solicit by any means, Victim
 15 #5, having had a reasonable opportunity to observe Victim #5 and knowing and in reckless
 16 disregard of the fact that Victim #5 had not attained the age of 18 years, and knowing and in
 17 reckless disregard that Victim #5 would be caused to engage in a commercial sex act, all in
 18 violation of Title 18 United States Code, Section 1591(a) and (b)(2).

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COUNT SEVEN

Coercion and Enticement
(18 U.S.C. § 2422(b))

Beginning on or about April 30, 2017, and continuing up to and including on or about August 28, 2017, in the State and Federal District of Nevada,

JACQUES ANTON LANIER,
a.k.a. "John Dupree,"

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #6, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, that is: *sex trafficking* in violation of Nevada Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children* in violation of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

COUNT EIGHT

Sex Trafficking of Children
(18 U.S.C. § 1591(a) and (b)(2))

Beginning on or about April 30, 2017, and continuing up to and including on or about August 28, 2017, in the State and Federal District of Nevada,

JACQUES ANTON LANIER,
a.k.a. "John Dupree,"

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit by any means, Victim #6, having had a reasonable opportunity to observe Victim #6 and knowing and in reckless disregard of the fact that Victim #6 had not attained the age of 18 years, and knowing and in

reckless disregard that Victim #6 would be caused to engage in a commercial sex act, all in violation of Title 18 United States Code, Section 1591(a) and (b)(2).

COUNT NINE
Coercion and Enticement
(18 U.S.C. § 2422(b))

Beginning on or about August 30, 2017, and continuing up to and including on or about December 4, 2017, in the State and Federal District of Nevada,

JACQUES ANTON LANIER,
a.k.a. "John Dupree,"

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #7, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, that is: *lewdness with a child* in violation of Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes, Section 201.300(2)(a)(1); *sexual exploitation of children*, in violation of Title 18, United States Code, Section 2251(a); and *sex trafficking of children*, in violation of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

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COUNT TEN

Coercion and Enticement
(18 U.S.C. § 2422(b))

Beginning on or about August 9, 2017, and continuing up to and including on or about November 29, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #8, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, that is: *lewdness with a child*, in violation of Nevada Revised Statutes, Section 201.230(1)(a); *statutory sexual seduction*, in violation of Nevada Revised Statutes, Section 200.368; *sex trafficking*, in violation of Nevada Revised Statutes, Section 201.300(2)(a)(1); and *sex trafficking of children*, in violation of Title 18, United States Code, Section 1591(a), all in violation of Title 18, United States Code, Section 2422(b).

COUNT ELEVEN

Sex Trafficking of Children
(18 U.S.C. § 1591(a) and (b)(2))

Beginning on or about August 9, 2017, and continuing up to and including on or about November 29, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit by any means, Victim #8, having had a reasonable opportunity to observe Victim #8 and knowing and in reckless disregard of the fact that Victim #8 had not attained the age of 18 years, and knowing and in

reckless disregard that Victim #8 would be caused to engage in a commercial sex act, all in violation of Title 18 United States Code, Section 1591(a) and (b)(2).

COUNT TWELVE
Coercion and Enticement
(18 U.S.C. § 2422(b))

Beginning on or about August 31, 2017, and continuing up to and including on or about September 7, 2017, in the State and Federal District of Nevada,

JACQUES ANTON LANIER,
a.k.a. "John Dupree,"

defendant herein, while using a facility and means of interstate and foreign commerce, did knowingly, and attempted to, persuade, induce, entice, and coerce, Victim #10, who had not attained the age of 18 years, to engage in prostitution and any sexual activity for which any person could be charged with a criminal offense, that is: *human trafficking*, in violation of California Penal Code, Section 236.1; *unlawful sexual intercourse with a person under 18-years-old*, in violation of California Penal Code, Section 261.5; *lewd or lascivious acts*, in violation of California Penal Code, Section 288 (effective September 9, 2010 to December 31, 2018); *oral copulation*, in violation of California Penal Code, Section 288a (effective September 9, 2013 to December 31, 2018); *sex trafficking of children*, in violation of Title 18, United States Code, Section 1591(a); and *sexual exploitation of children*, in violation of Title 18, United States Code, Section 2251(a), all in violation of Title 18, United States Code, Section 2422(b).

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COUNT THIRTEEN
Sex Trafficking of Children
(18 U.S.C. § 1591(a) and (b)(2))

Beginning on or about August 31, 2017, and continuing up to and including on or about September 7, 2017, in the State and Federal District of Nevada,

JACQUES ANTON LANIER,
a.k.a. "John Dupree,"

defendant herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit by any means, Victim #10, having had a reasonable opportunity to observe Victim #10 and knowing and in reckless disregard of the fact that Victim #10 had not attained the age of 18 years, and knowing and in reckless disregard that Victim #10 would be caused to engage in a commercial sex act, all in violation of Title 18 United States Code, Section 1591(a) and (b)(2).

COUNT FOURTEEN
Travel with Intent to Engage in Illicit Sexual Conduct
(18 U.S.C. § 2423(b))

Beginning on or about August 31, 2017, and continuing up to and including on or about September 7, 2017, in the State and Federal District of Nevada,

JACQUES ANTON LANIER,
a.k.a. "John Dupree,"

defendant herein, traveled in interstate commerce, with a motivating purpose of engaging in any illicit sexual conduct with Victim #10, all in violation of Title 18 United States Code, Section 2423(b).

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COUNT FIFTEEN

Transfer of Obscene Material to Minor
(18 U.S.C. § 1470)

Beginning on or about August 31, 2017, and continuing up to and including on or about September 7, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

defendant herein, did knowingly, and attempted to, while using the mail and any facility and means of interstate and foreign commerce, transfer obscene matter to Victim #10 who had not attained the age of 16 years, knowing that Victim #10 had not attained the age of 16 years, all in violation of Title 18, United States Code, Sections 1470.

COUNT SIXTEEN

Sexual Exploitation of Children
(18 U.S.C. § 2251(a))

Beginning on a date unknown, and continuing up to and including on or about October 4, 2017, in the State and Federal District of Nevada,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

defendant herein, did employ, use, persuade, induce, entice, and coerce a minor, Victim #13, to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and such visual depiction was actually transported or transmitted using any means and facility of interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

FORFEITURE ALLEGATION ONE

Coercion and Enticement and Travel with Intent to Engage in Illicit Sexual Conduct

1. The allegations contained in Counts 1, 3, 4, 5, 7, 9, 10, 12, and 14 of this Superseding Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture under 18 U.S.C. § 2428(a)(1) and 18 U.S.C. § 2428(b)(1)(A) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts 1, 3, 4, 5, 7, 9, 10, 12, and 14 of this Superseding Criminal Indictment,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

defendant herein, shall forfeit to the United States of America, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of violations of 18 U.S.C. §§ 2422(b) and 2423(b):

defendant herein, shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to facilitate the commission of any violation of 18 U.S.C. §§ 2422(b) and 2423(b):

a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480; and

b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las Vegas, Nevada, on December 21, 2017.

All under 18 U.S.C. §§ 2422(b) and 2423(b); 18 U.S.C. § 2428(a)(1); and 18 U.S.C. § 2428(b)(1)(A) with 28 U.S.C. § 2461(c).

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FORFEITURE ALLEGATION TWO

Sex Trafficking of Children

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3 1. The allegations contained in Counts 6, 8, 11, and 13 of this Superseding Criminal
4 Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging
5 forfeiture under 18 U.S.C. § 1594(d)(1) and 18 U.S.C. § 1594(e)(1)(A) with 28 U.S.C. § 2461(c).

6 2. Upon conviction of any of the felony offenses charged in Counts 6, 8, 11, and 13
7 of this Superseding Criminal Indictment,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

9 defendant herein, shall forfeit to the United States of America, any property, real or
10 personal, that was involved in, used, or intended to be used to commit or to facilitate the
11 commission of 18 U.S.C. § 1591(a), and any property traceable to such property:

12 defendant herein, shall forfeit to the United States of America, any property, real or
13 personal, involved in, used, or intended to be used to commit or to facilitate the commission of
14 18 U.S.C. § 1591(a), and any property traceable to such property:

15 a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480; and

16 b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las Vegas,
17 Nevada, on December 21, 2017.

18 All under 18 U.S.C. §§ 1591(a) and 1594(d)(1) and 18 U.S.C. § 1594(e)(1)(A) with 28
19 U.S.C. § 2461(c).

FORFEITURE ALLEGATION THREE

Transfer of Obscene Material to Minors

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22 1. The allegations contained in Count 15 of this Superseding Criminal Indictment
23 are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
24 under 18 U.S.C. §§ 1467(a)(1) and 1467(a)(3).

2. Upon conviction of the felony offense charged in Count 15 of this Superseding Criminal Indictment,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

defendant herein, shall forfeit to the United States of America, any obscene material produced, transported, mailed, shipped, or received in violation of 18 U.S.C. § 1470:

defendant herein, shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to promote the commission of 18 U.S.C. § 1470:

a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480; and

b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las Vegas, Nevada, on December 21, 2017.

All under 18 U.S.C. §§ 1467(a)(1), 1467(a)(3), and 1470.

FORFEITURE ALLEGATION FOUR
Sexual Exploitation of a Child

1. The allegations contained in Count 16 of this Superseding Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture under 18 U.S.C. § 2253(a)(1) and 2253(a)(3).

2. Upon conviction of the felony offense charged in Count 18 of this Superseding Criminal Indictment,

**JACQUES ANTON LANIER,
a.k.a. "John Dupree,"**

defendant herein, shall forfeit to the United States of America, any visual depiction described in 18 U.S.C. § 2251, or any book, magazine, periodical, film, videotape, or other

1 matter which contains any such visual depiction, which was produced, transported, mailed,
2 shipped or received in violation of 18 U.S.C. § 2251(a):

3 defendant herein, shall forfeit to the United States of America, any property, real or
4 personal, used or intended to be used to commit or to promote the commission of 18 U.S.C.
5 § 2251(a) or any property traceable to such property:

6 a. Samsung Galaxy S8 cellular phone, IMEI 355987083990480; and

7 b. Green Vibrator recovered from 1827 W. Gowan, #2148, North Las Vegas,
8 Nevada, on December 21, 2017.

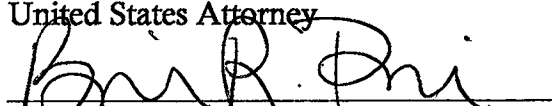
9 All under 18 U.S.C. §§ 2251(a), 2253(a)(1) and 2253(a)(3).

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11 DATED this 2d day of May, 2023.

12 A TRUE BILL:

13
14 /S/
FOREPERSON OF THE GRAND JURY

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18 JASON M. FRIERSON
United States Attorney

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20 BIANCA R. PUCCI
Assistant United States Attorney